

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DAMIAN MCDONALD, on behalf of the  
Laboratory Corporation of America Holdings  
Employees' Retirement Plan, himself, and all  
others similarly situated,

Plaintiffs,

v.

LABORATORY CORPORATION  
OF AMERICA HOLDINGS,

Defendant.

No. 1:22-cv-00680-LCB

**NOTICE OF SPECIAL APPEARANCE**

Pursuant to Local Rule 83.1(d), please take notice of the special appearance of William J. Delany as counsel of record for Defendant in the above-captioned civil action.

Mr. Delany certifies that he is an active member in good standing of the bars of the District of Columbia, New Jersey and Pennsylvania. Mr. Delany further certifies that he understands that by entering an appearance he submits to the disciplinary jurisdiction of the court for any misconduct in connection with the above-captioned civil action for which he is specially appearing. Mr. Delany represents that he will ensure that an attorney who is familiar with the case and has authority to control the litigation will be at all conferences, hearings, trials and other proceedings. Mr. Delany is associated with David C. Lindsay, who is a member of the bar of this Court, and is also serving as counsel of record for Defendant. Mr. Delany has registered as a filing user with the Court's CM/ECF system under Local Rule 5.3(c)(1).

Dated: March 28, 2025

Respectfully submitted,

/s/ William J. Delany  
William J. Delany  
Email: [wdelany@groom.com](mailto:wdelany@groom.com)  
GROOM LAW GROUP, CHARTERED  
1701 Pennsylvania Ave., NW  
Washington, D.C. 20006  
Phone: (202) 861-6643  
Fax: (202) 659-4503

David C. Lindsay (NC Bar No. 24380)  
Email: [david.lindsay@klgates.com](mailto:david.lindsay@klgates.com)  
K&L GATES, LLP  
301 Hillsborough Street  
Suite 1200  
Raleigh, NC 27603  
Phone: (919) 743-7304  
Fax: (919) 516-2004

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 28, 2025, a copy of the foregoing **NOTICE OF SPECIAL APPEARANCE** was filed electronically with the Clerk of Court using the CM/ECF system which will automatically send notification of filing to all parties of record.

*/s/ William J. Delany*  
William J. Delany